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Response to Comments
Revised Draft Work Plan for Phase I Cleanup and Foundation Removal
Site 84, Building 45
MCB Camp Lejeune, North Carolina
Prepared by OHM Remediation Services Corp.

EPA COMMENTS:

The Environmental Protection Agency (EPA) has completed its review of the above subject document. There are two areas of the report that are under question.

1. The sampling interval, for confirmation sampling, listed in Section 4 does not include the 2' to 4' interval. What is the rationale behind this?

Response: The 2' to 4' interval will be field-screened for PCBs, but will not be sent off-site for additional analysis unless the sample is specifically selected by the on-site chemist.

2. The document states that 5% of the samples will be analyzed off site. What number does this 5% equate to? The rule of the thumb is to send 10% of the samples for off site analysis. It needs to be verified that a representative number of samples are being sent off for confirmation. If we only have 39 samples then 5% would only be two. It is suggested that the text read "5% of the samples not to be less than ____".

Response: Ten percent of the samples will be sent for off-site analysis.

3. The Region 1 – SOP for concrete sampling is listed in the appendix. This document references EPA's guidance documents that have been superseded. If these references were used to prepare this document, the most recent versions can be found at www.epa.gov/quality1/qa_docs.html

Response: The guidance documents referenced in the EPA SOP for concrete sampling were not used in preparing the Work Plan.

NC Superfund Comments:

1. Table 3.2. The table contains no cleanup target for methylnaphthalene. The Region III RBC (acceptable if a Region IX PRG is not available) for 2-Methylnaphthalene is 1,600,000 ug/kg.

Response: Baker needs to add soil cleanup criteria to Table 1 of the Non-Time Critical Removal Action.

2. Table 3.2. Units should be ug/kg, not ug/l.

Response: Units will be changed.

3. Section 3.3. Poly sheeting is proposed to be placed over the soils prior to backfilling. Netting might work better than sheeting. In certain situations, sheeting could eventually

create problems with perched groundwater.

Response: A porous material will be used to mark the boundaries of the excavation area as necessary.

4. Section 4.3 Sampling and Analysis. Will a 5 percent lab check of field analysis provide sufficient numbers for statistics? Normally 10 percent is used.

Response: A 10 percent lab check of field analysis will be used.

5. Section 8.2 Characterization of Waste Streams. Based on previous sampling, pesticides are present in the waste materials. TCLP testing will determine if the pesticides are present at hazardous levels before selecting disposal options. In addition to TCLP results, care should be taken to consider the pesticide content of the soil before the disposal option is selected. For example, soils used as backfill, should not be left on the surface if it contains levels of pesticides greater than the Region IX PRGs.

Response: TCLP Pesticide Testing will be conducted on each waste stream.